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8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 In Re) Bankruptcy No. 16-15814-TWD
11) (Lead Case)
12 Lodge Holdings Company,)
13) Bankruptcy No. 16-15849-TWD
14 Mukilteo Lodge, LLC,) Bankruptcy No. 16-15850-TWD
15 Kirkland Lodge, LLC,) Bankruptcy No. 16-15851-TWD
16 Stadium Lodge, LLC,) Bankruptcy No. 16-15852-TWD
17 Downtown Lodge, LLC,) Bankruptcy No. 16-15853-TWD
18 Mill Creek Lodge, LLC,) Bankruptcy No. 16-15854-TWD
Greenwood Lodge, LLC) (Jointly Administered Cases)
Debtors.) EX PARTE MOTION FOR
EMERGENCY ORDER AUTHORIZING
INTERIM USE OF CASH
COLLATERAL AND ADEQUATE
PROTECTION PAYMENT AND
SETTING FINAL HEARING

19 COMES NOW THE DEBTOR(S), by and through their attorney, and moves the
20 Court as follows:

21 The Debtors have an interim emergency agreement to use cash collateral of
22 its primary secured creditor, CBC Partners I, LLC, via an “email exchange of counsel”,
23 but the parties want to formalize that agreement into a Stipulated Order for Interim
24 Use of Cash Collateral, filed concurrently herein, which more clearly details the claim,
25 their security interest, the payment agreements, replacement collateral, and that
26 otherwise meets the requirements under Local Rule **Appendix A**.

MOTION FOR ORDER AUTHORIZING INTERIM USE OF
CASH COLLATERAL AND ADEQUATE PROTECTION
PAYMENT - 1

126390.0019/6826506.3

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1 Accordingly, the Debtor requests the court enter an ex parte emergency Order
2 authorizing the immediate continued interim use of cash collateral and adequate
3 protection payments, and set an first hearing on the matter on January 6, 2017 at 9:30,
4 and then set a final hearing on use of cash collateral and adequate protection on the
5 Court's regular motion calendar for February 3, 2017 at 9:30. Notice of first hearing
6 will be given to all parties in interest requesting special notice, taxing agencies, and
7 as otherwise required by the Local Rules¹.

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9 Presented by:

10 VORTMAN & FEINSTEIN

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12 By /s/ Larry B Feinstein_____
13 Larry Feinstein, WSBA #6074
14 Attorneys for Debtor-in-Possession
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25 _____
26 ¹ For instance, American Express filed a UCC-1 Financing Statement that has been paid off and the Debtor is
awaiting the UCC-Release. They will be given notice for "comfort order" purposes.

MOTION FOR ORDER AUTHORIZING INTERIM USE OF
CASH COLLATERAL AND ADEQUATE PROTECTION
PAYMENT - 2

126390.0019/6826506.3

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